

**SUPPRESSED**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

**FILED**

**MAY 10 2018**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PRECIOUS NEAL and  
DERRICK CAMPBELL,

Defendants.

No.

**4:18CR406 CDP/DDN**

**INDICTMENT**

**COUNT I (CONSPIRACY – ALTERATION OF MONEY ORDERS)**

The Grand Jury charges that:

*Introduction*

1. Between on or about December 1, 2017 and continuing through on or about February 16, 2018 (the “relevant time period”), Defendants Precious Neal and Derrick Campbell resided in St. Louis County within the Eastern District of Missouri.
2. During the relevant time period, Defendant Campbell was employed in the low speed processing area of an operations center of U.S. Bank located in the City of St. Louis, Missouri within the Eastern District of Missouri. This area was commonly known as the “lock box.” In it, payments on all sorts of financial accounts were taken in and accounted for by U.S. Bank. While working in the lock box area, Defendant Campbell had access to money orders submitted by accountholders sent to U.S. Bank to be paid on their accounts. These money orders were typically delivered to the lock box facility by means of the United States Mail.

*The Conspiracy*

3. During the relevant time period, Defendant Campbell stole and purloined at least twenty-seven money orders issued by and under the direction of the United States Postal Service (the “money orders”). These money orders are forms of commercial paper directing payments from one party to another. These money orders all directed payments from various account holders to U.S. Bank or another institution whose payments were to be processed through the U.S. Bank lock box facility.
4. It was a part of the conspiracy that, once stolen, Defendants altered the payee line on the money orders to add either “Precious Neal” or “Derrick Campbell” as a payee on one of the money orders.
5. It was a part of the conspiracy that, typically, Defendant Campbell would direct Defendant Neal to pose as the payee and seek payment on one of the money orders from a United States Post Office.
6. It was a part of the conspiracy that, once successfully cashed, the proceeds of the forged and altered money orders would be shared between the Defendants.
7. It was a part of the conspiracy that, from time to time, Defendant Campbell would identify the post offices at which to present the forged and altered money orders and would drive Defendant Neal to those locations and wait for her outside.

*Offense Conduct*

8. Between on or about December 1, 2017 and continuing through on or about February 16, 2018, in the Eastern District of Missouri and elsewhere, the defendants,

**PRECIOUS NEAL and  
DERRICK CAMPBELL,**

did agree to commit an offense against the United States, to wit: alteration and forgery of postal money orders in violation of Title 18, United States Code Section 500, did knowingly and voluntarily join such agreement knowing its purpose and, during the existence of said agreement, one or more overt acts in furtherance of the same were committed by a party to the agreement.

All in violation of Title 18, United States Code Section 371.

**COUNT II – (OBSTRUCTION OF THE MAIL)**

9. The allegations contained in Count I are hereby realleged and incorporated by reference.
10. Between on or about December 1, 2017 and continuing through on or about February 16, 2018, the Defendant,

**PRECIOUS NEAL,**

did knowingly and willfully obstruct and retard the passage of the United States Mail.

In violation of Title 18, United States Code Section 1701.

A TRUE BILL

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FOREPERSON

JEFFREY B. JENSEN  
United States Attorney

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Thomas C. Albus, #96250  
Assistant United States Attorney